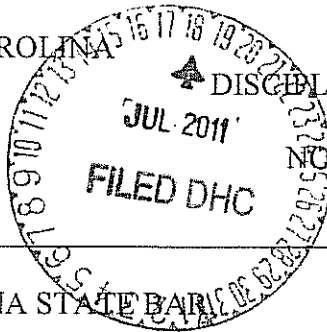


STATE OF NORTH CAROLINA

WAKE COUNTY



BEFORE THE
DISCIPLINARY HEARING COMMISSION
OF THE
NORTH CAROLINA STATE BAR
11 DHC 12

THE NORTH CAROLINA STATE BAR

Plaintiff,

ANSWER

v.

LEEANNE QUATTRUCCI, Attorney,

Defendant.

The Defendant answering the Complaint of the Plaintiff heretofore filed in this matter alleges and says:

1. That the allegations of paragraph 1 of the Complaint are admitted.
2. That the allegations of paragraph 2 of the Complaint are admitted.
3. That the allegations of paragraph 3 of the Complaint are admitted.
4. That the allegations of paragraph 4 of the Complaint are admitted.

FIRST CLAIM

5. That the allegations of paragraph 5 of the Complaint are admitted.
6. That the allegations of paragraph 6 of the Complaint are admitted.
7. That the allegations of paragraph 7 of the Complaint are admitted.
8. That the allegations of paragraph 8 of the Complaint are admitted.

THEREFORE, IN RESPONSE TO PLAINTIFF'S FIRST CLAIM FOR RELIEF AGAINST THE DEFENDANT, DEFENDANT ALLEGES THE FOLLOWING:

Defendant, in answering Plaintiff's First Claim for Relief, reiterates the answers contained hereinabove in paragraphs 5 through 8 and acknowledges a violation of Rule 1.8 (e) of the Rules of Professional Conduct alleged in Plaintiff's First Claim for Relief.

SECOND CLAIM

9. That the allegations of paragraph 9 of the Complaint are admitted.
10. That the allegations of paragraph 10 of the Complaint are admitted.
11. That the allegations of paragraph 11 of the Complaint are admitted.
12. That the allegations of paragraph 12 of the Complaint are admitted.
13. That the allegations of paragraph 13 of the Complaint are admitted.
14. That the allegations of paragraph 14 of the Complaint are admitted.
15. That the allegations of paragraph 15 of the Complaint are admitted.
16. That the allegations of paragraph 16 of the Complaint are admitted.
17. That the allegations of paragraph 17 of the Complaint are admitted.
18. That the allegations of paragraph 18 of the Complaint are admitted.
19. That the allegations of paragraph 19 of the Complaint are admitted.
20. That the allegations of paragraph 20 of the Complaint are admitted, except that the defendant respectfully denies that these acts were committed with an intent to misrepresent, deceive, or act in a dishonest manner.

THEREFORE, IN RESPONSE TO PLAINTIFF'S SECOND CLAIM FOR RELIEF AGAINST THE DEFENDANT, DEFENDANT ALLEGES THE FOLLOWING:

Defendant, in answering Plaintiff's Second Claim for Relief, acknowledges a violation of Rule 1.15-2 (j) of Rules of Professional Conduct but denies any violation of Rules 8.4 (b) and 8.4 (c) as alleged in the Complaint.

THIRD CLAIM

21. That the allegations of paragraph 21 of the Complaint are admitted or denied as set forth above.
22. That the allegations of paragraph 22 of the Complaint are admitted.

23. That the allegations of paragraph 23 of the Complaint are admitted. The severance agreement was executed on February 5, 2010, between Virginia Hager and LeeAnne Quattrucci after LeeAnne Quattrucci resigned several days earlier. In further answering paragraph 23 of the Complaint, the severance agreement was initiated by Virginia Hager and drafted by Ms. Hager's attorneys. The agreement was hand delivered to Ms. Quattrucci, on February 3, 2010 with a letter from Ms. Hager stating: "If we cannot finalize this Agreement by the close of business Tuesday February 9, 2010 then your employment will be immediately terminated and you will **forfeit any use of office facilities, resources or personnel thereafter.**"
24. That the allegations of paragraph 24 of the Complaint are admitted. The severance agreement also dealt with a number of areas including, but not limited to, sections relating to "termination of employment", "severance benefits", "continuation of base salary", "health benefits", "withholding and reporting requirements", "no other payments or benefits", "vacation time prior to separation date", "authorized withholding", "cooperation with respect to billing", "clients", "communications to the public and non-disparagement", "professional conduct", "defense of claims/grievances; indemnification", "non-solicitation of employees", "return of company property", "trust accounts", and "email address".
25. The allegations of paragraph 25 of the Complaint are respectfully denied. The severance agreement, which had been initiated by Ms. Hager and wholly prepared by her attorneys, was presented to the defendant as an ultimatum: sign within six (6) days, or face being denied access to files, e-mail, office facilities, or other means to effectively represent as many as sixty-five (65) or more clients. Defendant signed the severance agreement to better insure a more responsible addressing of client concerns as well as allow for a suitable and appropriate departure from Ms. Hager's office. The language contained in Paragraph 9 of the severance agreement was the product of Ms. Hager and her counsel. The defendant signed the entire agreement as it was presented in order to avoid the real probability that client interests would be harmed if defendant did not stay on at Hager & Associates to provide representation in their cases.

THEREFORE, IN RESPONSE TO PLAINTIFF'S THIRD CLAIM FOR RELIEF AGAINST THE DEFENDANT, DEFENDANT ALLEGES THE FOLLOWING:

Defendant, in answering Plaintiff's Third Claim for Relief, acknowledges an unintentional violation of Rule 8.4 (d) of the Rules of Professional Conduct but specifically denies a violation of Rule 8.4 (a) of the Rules of Professional Conduct as alleged.

WHEREFORE, having stated her Answer to the Complaint, Defendant prays the Disciplinary Hearing Committee as follows:

1. That the Disciplinary Hearing Committee convene to determine what, if any, discipline is warranted for the Rule violations admitted herein.

RESPECTFULLY SUBMITTED, this the 18th day of July, 2011

CHESHIRE, PARKER, SCHNEIDER & BRYAN



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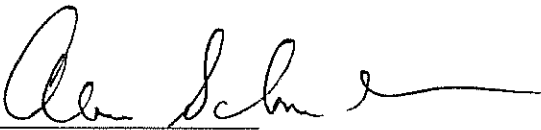
Attorney for Defendant

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing Answer was **HAND-DELIVERED** to the following:

Carmen Bannon
Deputy Counsel
North Carolina State Bar
208 Fayetteville Street Mall
P.O. Box 25908
Raleigh, North Carolina 27611

This the 18th day of July, 2011.


Alan M. Schneider